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PER lll
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**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	NO. 1:16-CR-00212
)	
v.)	(CHIEF JUDGE CONNER)
)	
KEVIN COLES,)	
DEVIN DICKERSON,)	UNDER SEAL
TOREY WHITE,)	
CHRISTOPHER JOHNSON,)	
JERELL ADGEBESAN,)	
KENYATTA CORBETT,)	
MICHAEL BUCK)	
NICHOLAS PREDDY,)	
JOHNNIE JENKINS-)	
ARMSTRONG,)	
TERRANCE LAWSON, and)	
TYRONE ARMSTRONG)	
Defendants)	

SECOND SUPERSEDING INDICTMENT

INTRODUCTION

At times material to the Second Superseding Indictment:

1. The Drug Enforcement Administration (DEA) was an agency of the United States responsible for enforcing and administering the Comprehensive Drug Abuse Prevention and Control Act.
2. The Washington County Drug Task Force was part of the DEA Drug Task Force in Hagerstown, Maryland, and included federal,

state, and local law enforcement officials who investigated drug trafficking offenses.

3. The Black Guerilla Family (BGF) was a nationwide gang engaged in criminal activities, including murder, robbery, extortion, narcotics trafficking, obstruction of justice, and witness intimidation. Defendants Christopher JOHNSON, Nicholas PREDDY, Johnnie JENKINS-ARMSTRONG, Terrance LAWSON, and Tyrone ARMSTRONG were members of the BGF.

4. In or about June 2016, the DEA and Pennsylvania State Police (PSP) investigated the drug trafficking activities of defendant Kevin COLES, a/k/a "K," defendant Devin DICKERSON, a/k/a "Shy," and their associates, in the Middle District of Pennsylvania and elsewhere.

5. Defendants Kevin COLES, Devin DICKERSON, and Torey WHITE, a/k/a "Drop," were involved in the unlawful distribution of controlled substances in the Chambersburg and Mercersburg areas of Franklin County, Pennsylvania, in Hagerstown, Maryland, and elsewhere. Kevin COLES, Devin DICKERSON, and Torey WHITE distributed and conspired to distribute cocaine hydrochloride, cocaine base (crack cocaine), and heroin.

6. Phillip Jackson was a customer who purchased controlled substances for personal use and distribution from Kevin COLES and Torey WHITE. Phillip Jackson lived on a farm ("Jackson's Farm") in Mercersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania.

7. Kevin COLES, Devin DICKERSON, and Torey WHITE enlisted and caused to be enlisted other individuals, including Wendy Chaney, to assist in their drug distribution activities. Kevin COLES, Devin DICKERSON, and Torey WHITE used and threatened to use violence to prevent those individuals from cooperating with law enforcement.

8. In or about June 2016, Wendy Chaney worked as an informant for the Washington County, Maryland Drug Task Force. In her capacity as an informant, Wendy Chaney provided information to federal and state law enforcement officials about the drug trafficking activities of defendants Kevin COLES, Devin DICKERSON, Torey WHITE, and other individuals.

9. In or about June 2016, Kevin COLES, Devin DICKERSON, and Torey WHITE suspected that Wendy Chaney was working as a law enforcement informant.

10. On or about June 25, 2016, defendants Jerell ADGEBESAN and Kenyatta CORBETT traveled from Hagerstown, Maryland to Baltimore, Maryland. In Baltimore, Jerell ADGEBESAN and Kenyatta CORBETT enlisted defendants Christopher JOHNSON and Johnnie JENKINS-ARMSTRONG, and other members of the BGF gang to prepare for, plan, and execute the robbery of Phillip Jackson and the murder of Wendy Chaney.

11. On or about June 25, 2016, Jerell ADGEBESAN, Kenyatta CORBETT, Christopher JOHNSON, Johnnie JENKINS-ARMSTRONG, and other individuals drove from Baltimore to Hagerstown to meet defendant Michael BUCK at his residence. In the morning, Kenyatta CORBETT and Michael BUCK conducted reconnaissance at Jackson's Farm. Michael BUCK then monitored Jackson's Farm and Phillip Jackson that day.

12. On or about June 25, 2016, Torey WHITE, who was in a romantic relationship with Wendy Chaney, induced and caused the inducement of Wendy Chaney to travel to Jackson's Farm.

13. On or about June 25, 2016, after meeting at Michael BUCK's residence, Jerell ADGEBESAN, Kenyatta CORBETT, Christopher

JOHNSON, Johnnie JENKINS-ARMSTRONG, and Michael BUCK traveled to Jackson's Farm.

14. On or about June 25, 2016, Jerell ADGEBESAN, Christopher JOHNSON, Johnnie JENKINS-ARMSTRONG, a person referenced herein as "D.C.," and other individuals encountered Phillip Jackson, Wendy Chaney, and Brandon Coles at Jackson's Farm. Jerell ADGEBESAN, Christopher JOHNSON, Johnnie JENKINS-ARMSTRONG, D.C., and other individuals subdued and caused to be subdued Phillip Jackson, Wendy Chaney, and Brandon Coles, by binding their hands behind them with plastic zip ties.

15. On or about June 25, 2016, Jerell ADGEBESAN, Christopher JOHNSON, Johnnie JENKINS-ARMSTRONG, D.C., and other individuals used and caused to be used a firearm to shoot Phillip Jackson, Wendy Chaney, and Brandon Coles in the head and back areas.

16. On or about June 25, 2016, following the shootings, Jerell ADGEBESAN, Christopher JOHNSON, Johnnie JENKINS-ARMSTRONG, and other individuals traveled to a convenience store near Hagerstown, Maryland. At the convenience store, Christopher JOHNSON pistol-whipped a customer and robbed the customer of the

customer's possessions.

17. On or about June 25, 2016, PSP responded to Jackson's Farm and discovered the body of Wendy Chaney, which bore two gunshot wounds. PSP also discovered the body of Brandon Cole, which bore a single gunshot wound. PSP further discovered Phillip Jackson, who bore a single gunshot wound, but was still alive. All three individuals had been set on fire.

18. On or about June 26, 2016, Phillip Jackson died from his injuries.

19. In or about July 2016, law enforcement officials arrested Kevin COLES and Devin DICKERSON in Hagerstown, Maryland, for narcotics trafficking offenses.

20. In or about May 2017, Christopher JOHNSON and other individuals suspected that Jerell ADGEBESAN was cooperating with federal law enforcement officials in connection with the June 25, 2016 murders. Christopher JOHNSON and other individuals decided to kill Jerell ADGEBESAN to prevent his cooperation with federal authorities.

21. In or about May 2017, Christopher JOHNSON, Johnnie JENKINS-ARMSTRONG, Nicholas PREDDY, Terrance LAWSON,

Tyrone ARMSTRONG, and other individuals, attempted to locate Jerell ADGEBESAN, to kill him.

22. On or about May 9, 2017, Nicholas PREDDY, Johnnie JENKINS-ARMSTRONG, Terrance LAWSON, Tyrone ARMSTRONG, and another individual located and restrained Jerell ADGEBESAN in Baltimore, Maryland. ADGEBESAN subsequently escaped.

THE GRAND JURY CHARGES:

COUNT ONE

On or about June 25, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

did unlawfully conspire with each other, and with persons known and unknown to the grand jury, to unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **KEVIN COLES, DEVIN DICKERSON, TOREY WHITE, CHRISTOPHER JOHNSON, JERELL ADGEBESAN, KENYATTA CORBETT, MICHAEL BUCK, and JOHNNIE JENKINS ARMSTRONG,** did unlawfully take and obtain and attempt

to take and obtain personal property consisting of United States currency, controlled substances, and firearms from the person of and in the presence of Phillip Jackson, owner and possessor of said property, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person in that the defendants physically restrained Jackson and two other individuals at gun point and then shot and killed Phillip Jackson and the two other individuals during the course of the robbery.

All in violation of Title 18, United States Code, Section 1951(a).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

On or about June 25, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **KEVIN COLES, DEVIN DICKERSON, TOREY WHITE, CHRISTOPHER JOHNSON, JERELL ADGEBESAN, KENYATTA CORBETT, MICHAEL BUCK, and JOHNNIE JENKINS ARMSTRONG,** and another and others known to the grand jury, did unlawfully take and obtain and attempt to take and obtain personal property consisting of

United States currency, controlled substances, and firearms from the person of and in the presence of Phillip Jackson, owner and possessor of said property, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person that is, the defendants physically restrained Jackson and two others at gun point and then shot and killed Phillip Jackson and two others during the course of the robbery, and did aid, abet, counsel, command, induce and procure each other in the commission of this crime.

All in violation of Title 18, United States Code, Section 1951 (a); and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT THREE

On or about June 25, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

unlawfully and knowingly did use, brandish and discharge a firearm during and in relation to a crime of violence which may be prosecuted in a court of the United States, that is, (1) Hobbs Act robbery in violation of Title 18, United States Code, Section 1951 (a), and (2) killing of a witness, in violation of Title 18, United States Code, Section 1512(a)(1), and in the course of that violation of 18 United States Code, Section 924(c), caused the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111, to wit, the defendants caused the death of Phillip Jackson through the use and discharge of said firearm, and did aid, abet,

counsel, command, induce and procure the commission of this crime.

All in violation of Title 18, United States Code, §§ 924(j) and 924(c); § 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FOUR

On or about June 25, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

unlawfully and knowingly did use, brandish and discharge a firearm during and in relation to a crime of violence which may be prosecuted in a court of the United States, that is, (1) Hobbs Act robbery in violation of Title 18, United States Code, Section 1951 (a), and (2) killing of a witness, in violation of Title 18, United States Code, Section 1512(a)(1), and in the course of that violation of 18 United States Code, Section 924(c), caused the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111, to wit, the defendants caused the death of Brandon Cole through the use and discharge of said firearm, and did aid, abet, counsel,

command, induce and procure the commission of this crime.

All in violation of Title 18, United States Code, §§ 924(j) and 924(c); and § 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FIVE

On or about June 25, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

unlawfully and knowingly did use, brandish and discharge a firearm during and in relation to a crime of violence which may be prosecuted in a court of the United States, that is, (1) Hobbs Act robbery in violation of Title 18, United States Code, Section 1951 (a), and (2) killing of a witness, in violation of Title 18, United States Code, Section 1512(a)(1), and in the course of that violation of 18 United States Code, Section 924(c), caused the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111, to wit, the defendants caused the death of Wendy Chaney through the use and discharge of said firearm, and did aid, abet, counsel,

command, induce and procure the commission of this crime.

All in violation of Title 18, United States Code, §§ 924(j) and 924(c); and § 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SIX

On or about the 25th day of June, 2016, in the Middle District of Pennsylvania and elsewhere, the defendants

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

conspired with each other, and with persons known and unknown to the grand jury, to travel and cause another to travel in interstate commerce from in and around Baltimore, Maryland to Mercersburg, Franklin County, Pennsylvania with intent that a murder be committed in violation of the laws of the Commonwealth of Pennsylvania as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, to wit, among other things, United States currency, drugs, and firearms, and did aid, abet, counsel, command, induce and procure the commission of this crime.

All in violation of Title 18, United States Code, Section 1958; Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SEVEN

On or about the 25th day of June, 2016, in the Middle District of Pennsylvania and elsewhere, the defendants

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

with each other, and with persons known and unknown to the grand jury, killed another person, to wit, Wendy Cheney, with intent to prevent the communication by her to a law enforcement officer of the United States as defined in 18 U.S.C. § 1515 (a) (4), with information relating to the commission and possible commission of a Federal offense, and did aid, abet, counsel, command, induce and procure the commission of this crime.

In violation of Title 18, United States Code, § 1512 (a)(1)(C);
Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHT

On or about the 25th day of June, 2016, in the Middle District of Pennsylvania and elsewhere, the defendants

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

with each other, and with persons known and unknown to the grand jury, killed another person, to wit, Phillip Jackson, with intent to prevent the communication by him to a law enforcement officer of the United States as defined in 18 U.S.C. § 1515 (a) (4), with information relating to the commission and possible commission of a Federal offense, and did aid, abet, counsel, command, induce and procure the commission of this crime.

All in violation of Title 18, United States Code, § 1512 (a)(1) (C); and Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT NINE

On or about the 25th day of June, 2016, in the Middle District of Pennsylvania and elsewhere, the defendants

**KEVIN COLES,
DEVIN DICKERSON,
TOREY WHITE,
CHRISTOPHER JOHNSON,
JERELL ADGEBESAN,
KENYATTA CORBETT,
MICHAEL BUCK, and
JOHNNIE JENKINS ARMSTRONG,**

with each other, and with persons known and unknown to the grand jury, killed another person, to wit, Brandon Coles, with intent to prevent the communication by him to a law enforcement officer of the United States as defined in 18 U.S.C. § 1515 (a) (4), with information relating to the commission and possible commission of a Federal offense, and did aid, abet, counsel, command, induce and procure the commission of this crime.

In violation of Title 18, United States Code, § 1512(a)(1)(C); & Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT TEN

On June 25, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendant,

CHRISTOPHER JOHNSON,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly, and by virtue of said prior felony conviction, unlawfully possess a firearm, that is, a handgun of unknown make, model and caliber, in and affecting interstate commerce in that the defendant possessed said firearm in the Commonwealth of Pennsylvania and then transported said firearm into Maryland.

All in violation of Title 18, United States Code, Sections 922(g)(1) and Section 3237.

THE GRAND JURY FURTHER CHARGES:

COUNT ELEVEN

On or about June 25, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

CHRISTOPHER JOHNSON,

did with knowledge or reasonable cause to believe that an offense punishable by a term of imprisonment exceeding one year is to be committed therewith, that is, armed robbery under the laws of Maryland, transported a firearm in interstate commerce between the Commonwealth of Pennsylvania and Maryland.

All in violation of Title 18, United States Code, Section 924(b) and Section 3237.

THE GRAND JURY FURTHER CHARGES:

COUNT TWELVE

Beginning on or about April 1, 2016, up to and including September 3, 2016, in Hagerstown, Maryland and in Chambersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KENYATTA CORBETT and
JERELL ADGEBESAN,**

did intentionally, knowingly, and unlawfully combine, conspire, confederate and agree with persons known and unknown to the grand jury, to distribute, and possess with the intent to distribute 1,000 grams and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

MANNER AND MEANS

1. It was a part of the conspiracy that the defendants would travel between Maryland, West Virginia, and Pennsylvania for the purpose of, among other things, manufacturing, distributing, storing, and possessing heroin.

2. It was further a part of the conspiracy that the defendant, Kenyatta Corbett, supplied approximately 150 grams of heroin on a weekly basis to Jerell ADGEBESAN, and persons known to the grand jury, for further distribution by Jerell ADGEBESAN.

All in violation of Title 21, United States Code, Sections 846.

THE GRAND JURY FURTHER CHARGES:

COUNT THIRTEEN

Beginning on or about April 1, 2016, up to and including September 3, 2016, in Hagerstown, Maryland and in Chambersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KENYATTA CORBETT and
JERELL ADGEBESAN,**

did intentionally, knowingly, and unlawfully possess with the intent to distribute heroin, a Schedule I controlled substance, and did aid, abet, counsel, command, induce and procure same.

All in violation of Title 21, United States Code, Section 841(a)(1); and Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT FOURTEEN

Beginning on or about April 1, 2016, up to and including July 7, 2016, in Hagerstown, Maryland and in Chambersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES and
DEVIN DICKERSON,**

did intentionally and knowingly unlawfully combine, conspire, confederate and agree with each other, and with persons known and unknown to the grand jury, to distribute, and possess with the intent to distribute at least 100 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and at least 28 grams of a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, and cocaine HCL, both Schedule II controlled substances, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

MANNER AND MEANS

1. It was a part of the conspiracy that the defendants would travel between Maryland and Pennsylvania for the purpose of, among other things, manufacturing, distributing, storing, and possessing heroin, cocaine HCL, and cocaine base, also known as crack cocaine. COLES was known as and went by the nickname of "K". DICKERSON was known as and went by the nickname of "Shy".

2. It was further a part of the conspiracy that COLES and DICKERSON utilized a number of individuals who lived in those areas to assist in their drug distribution activities. One of those individuals was C.S. who had an apartment at 142 Lincoln Way West, Apartment No. 5, Chambersburg, PA. C.S. was supplied with drugs by defendants COLES and DICKERSON and sold to various drug users on their behalf. C.S. utilized a particular cell phone to maintain contact information for the drug business, to receive calls and texts from drug customers, and to communicate with COLES and DICKERSON.

3. It was further a part of the conspiracy that in mid-June 2016 COLES and DICKERSON used COLES' girlfriend, Wendy Chaney, to visit with C.S. in the Franklin County Prison to get custody of C.S.'s

drug cell phone that was placed in property at the Franklin County Prison when C.S. was arrested.

4. It was further a part of the conspiracy that COLES and DICKERSON then utilized C.S.'s drug cell phone to carry on business while C.S. was incarcerated. COLES and DICKERSON also took over and utilized the apartment at 142 Lincoln Way West as a location for drug distribution activity.

5. It was further a part of the conspiracy that sometime around this period in mid to late June 2016 that COLES' girlfriend, Wendy Chaney, began to provide information to the Washington County, MD Drug Task Force regarding the drug trafficking activities of COLES and DICKERSON. The U.S. Drug Enforcement Administration (DEA) was part of the Task Force in Hagerstown. COLES and DICKERSON became aware that Wendy Chaney had outstanding criminal charges against her and believed she was cooperating with law enforcement and, to protect the conspiracy, decided to have her killed.

6. It was a further part of the conspiracy that COLES and DICKERSON used force, violence and intimidation to maintain order and loyalty among members of the conspiracy and drug customers. As an example, COLES thought an associate had cheated him on a drug

debt. COLES assaulted her in C.S.'s apartment, zip tied her hands behind her back, put a gun to the back of her head and told her he was going to kill her.

7. It was further a part of the conspiracy that the defendants would use, possess, carry and brandish firearms as a part of the operation of their drug trafficking conspiracy and would store these weapons at various locations to conceal the weapons and to have them readily accessible to the defendants.

8. It was further a part of the conspiracy that on May 10, 2016 the defendants distributed heroin to a person and persons known to the grand jury. One of those individuals who used the heroin supplied by the defendants suffered serious bodily injury, that is, the person overdosed on the drug and had to be resuscitated.

9. It was further a part of the conspiracy that on July 6-7, 2016 the defendants distributed heroin to a person and persons known to the grand jury. One of those individuals who used the heroin supplied by the defendants suffered serious bodily injury, that is, the person overdosed on the drug and had to be resuscitated.

All in violation of Title 21, United States Code, Section 846.

THE GRAND JURY FURTHER CHARGES:

COUNT FIFTEEN

Beginning on or about April 1, 2016, up to and including July 7, 2016, in Chambersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

KEVIN COLES,

did intentionally and knowingly unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of both cocaine HCL and cocaine base, also known as crack cocaine, both Schedule II controlled substances, and did aid, abet, counsel, command, induce and procure same.

All in violation of Title 21, United States Code, Section 841(a) (1); Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SIXTEEN

Beginning on or about April 1, 2016, up to and including July 7, 2016, in Chambersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

DEVIN DICKERSON,

did intentionally and knowingly unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of both cocaine HCL and cocaine base, also known as crack cocaine, both Schedule II controlled substances, and did aid, abet, counsel, command, induce and procure same.

All in violation of Title 21, United States Code, Section 841(a) (1); Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT SEVENTEEN

On July 22, 2016, in Chambersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES and
DEVIN DICKERSON,**

did intentionally and knowingly unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance, and did aid, abet, counsel, command, induce and procure same.

All in violation of Title 21, United States Code, Section 841(a)(1); Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT EIGHTEEN

On May 10, 2016, in Franklin County, Pennsylvania, within the Middle District of Pennsylvania, the defendants,

**KEVIN COLES, and
DEVIN DICKERSON,**

did intentionally and knowingly unlawfully distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and did aid, abet, counsel, command, induce and procure same and serious bodily injury of a person known to the grand jury resulted from the use of these controlled substances distributed by the defendants.

All in violation of Title 21, United States Code, Section 841(a) (1) and (b) (1) (C); Title 18, United States Code, Section 2.

THE GRAND JURY FURTHER CHARGES:

COUNT NINETEEN

Beginning on or about April 1, 2016, up to and including July 7, 2016, in Chambersburg, Franklin County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendants,

**KEVIN COLES, and
DEVIN DICKERSON,**

during and in relation to a drug trafficking crime as alleged in Counts Fourteen through Eighteen of the Second Superseding Indictment for which they may be prosecuted in a court of the United States, did intentionally and knowingly carry, and possess in furtherance thereof, a firearm(s), and did aid, abet, counsel, command, induce and procure same.

All in violation of Title 18, United States Code, Section 924(c) (1); Title 18, United States Code, Section 2; *Pinkerton v. United States*, 328 U.S. 640 (1946).

THE GRAND JURY FURTHER CHARGES:

COUNT TWENTY

Beginning on or May 3, 2017, up to and including May 9, 2017, in Baltimore, Maryland and in Harrisburg, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendants

**CHRISTOPHER JOHNSON,
NICHOLAS PREDDY,
JOHNNIE JENKINS ARMSTRONG,
TERRANCE LAWSON, and
TYRONE ARMSTRONG**

conspired with each other, and with persons known and unknown to the grand jury, to kill another person with intent to: (a) prevent the attendance and testimony of any person in an official proceeding, in violation of 18 U.S.C. § 1512 (a) (1) (A), and (b) prevent the communication by any person to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense, in violation of 18 U.S.C. § 1512(a) (1) (C), in that defendants plotted to kill Jerell Adgebegan, an individual who the defendants believed was assisting the government and was a potential witness before a federal grand jury in Harrisburg and in a future federal trial involving the triple murder committed on June 25,

2016 in Mercersburg, Franklin County, Pennsylvania and related crimes.

All in violation of Title 18, United States Code, Section 1512 (k).

THE GRAND JURY FURTHER CHARGES:

COUNT TWENTY-ONE

Beginning on or May 3, 2017, up to and including May 9, 2017, in Baltimore, Maryland and in Harrisburg, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendants

**CHRISTOPHER JOHNSON,
NICHOLAS PREDDY,
JOHNNIE JENKINS ARMSTRONG,
TERRANCE LAWSON, and
TYRONE ARMSTRONG**

attempted with each other, and with persons known and unknown to the grand jury, to kill another person with intent to: (a) prevent the attendance and testimony of any person in an official proceeding, in violation of 18 U.S.C. § 1512 (a) (1) (A), and (b) prevent the communication by any person to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense, in violation of 18 U.S.C. § 1512(a) (1) (C), in that defendants attempted to kill and took a substantial step towards killing Jerell Adgebegan, an individual who the defendants believed was assisting the government and was a potential witness before a federal grand jury in Harrisburg and in a future federal trial

involving the triple murder committed on June 25, 2016 in
Mercersburg, Franklin County, Pennsylvania and related crimes.

All in violation of Title 18, United States Code, § 1512 (a) (1) (A)
& (C).

THE GRAND JURY FURTHER CHARGES:

COUNT TWENTY-TWO

Beginning on or May 3, 2017, up to and including May 9, 2017, in Baltimore, Maryland and in Harrisburg, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendants

**NICHOLAS PREDDY,
TERRANCE LAWSON, and
TYRONE ARMSTRONG**

knowing that an offense against the United States has been committed, to wit, Hobbs Act murder and robbery, did receive, relieve, comfort, and assist the offenders, Christopher Johnson, Johnnie Jenkins Armstrong and others, in order to hinder and prevent the offenders' apprehension, trial, and punishment.

All in violation of Title 18, United States Code, § 3.

A TRUE BILL



FOREPERSON

DAVID J. FREED
UNITED STATES ATTORNEY


WILLIAM A. BEHE
Assistant United States Attorney

DATE: 12-20-2018

[REDACTED]